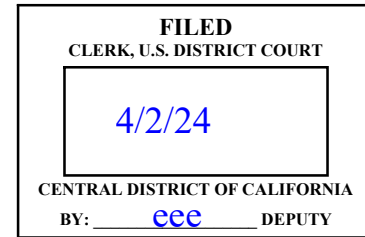


Name: Russell J Terry  
Address: 1401 21ST ST STE R  
SACRAMENTO, CA 95811  
Phone number: 720-603-1872  
Plaintiff in Pro Per



**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

Russell J Terry,  
Plaintiff,  
vs.  
Apex Systems, LLC, AT&T, DirecTV,  
LLC, Mehak Delawalla, Kim Chu, John  
Goulding, Oscar Montoya, Ian  
Hafkenschiel, Daniel Salt  
Defendants.

Case No.: CV23-7707-FMO(JCx)

**DISCOVERY MATTER**

**PLAINTIFF'S NOTICE OF  
MOTION AND MOTION TO  
COMPEL DEFENDANT APEX  
SYSTEMS LLC TO PRODUCE SET  
1 AND SET 2 DOCUMENTS AND  
RESPOND TO SET 1 AND SET 2  
INTERROGATORIES, AND  
OVERRULE OBJECTIONS**

DATE: April 30, 2024

TIME: 9:30 a.m.

JUDGE: Hon. Jacqueline Chooljian

CTRM: 750

Discovery Cutoff: None Set

Pre-Trial Conference: None Set

Trail Date: None Set

1 TO THE HONORABLE COURT AND ALL PARTIES AND THEIR  
2 ATTORNEYS OF RECORD:

3  
4 PLEASE TAKE NOTICE that on April 30, 2024, at 9:30 AM, or as  
5 soon thereafter as the matter may be heard, in the courtroom of the  
6 Honorable Jacqueline Chooljian, court room 750, Plaintiff Russell Terry,  
7 proceeding pro se, will and hereby does move the court for an order  
8 compelling Defendant Apex Systems, LLC to Produce set 1 and set 2  
9 Documents as required by Federal Rule of Civil Procedure 34(b)(2) and  
10 Respond to set 1 and set 2 Interrogatories as required by FRCP 33(b).  
11 Additionally, Plaintiff requests that the court overrule any objections raised  
12 by Defendant Apex Systems, LLC in response to the discovery requests.

13 This Motion is supported by the Memorandum of Points and  
14 Authorities and Personal Declaration of Russell Terry.

15 This Motion is made pursuant to Local Rule 37-2.4(c). The opposing  
16 counsel failed to sign and return the joint stipulation to counsel for the  
17 moving party.  
18

19  
20 Dated: April 2, 2024

Russell J Terry

21 /s/ Russell Terry

22 Russell J Terry

23 1401 21ST ST STE R

24 SACRAMENTO, CA 95811

25 [R2dat@yahoo.com](mailto:R2dat@yahoo.com)

26 720-603-1872  
27  
28

CERTIFICATE OF SERVICE

I hereby certify that on April 2, 2024, I electronically filed the foregoing document with the Clerk of the Court using the EDSS. I also certify that the foregoing document is being served this day to counsel of record Wendy Sugg at Sugg Law via email transmission to [wendy@sugglaw.com](mailto:wendy@sugglaw.com).

Date: April 2, 2024

\_\_\_\_/s/ Russell Terry\_\_\_\_\_

Russell Terry  
1401 21ST ST STE R  
SACRAMENTO, CA 95811  
[R2dat@yahoo.com](mailto:R2dat@yahoo.com)  
Phone number: 720-603-1872